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August 14, 2023

By ECF

Honorable Ann M. Donnelly
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Sylla et al., v. Amazon Labor Union et al.
Civil Case No. 23- 05261 (AMD)
Request for Permission to File Second Amended Complaint

Dear Judge Donnelly:

This Court has set up a briefing schedule on Plaintiffs' Motion for A Preliminary Injunction which required a filing by Plaintiffs by August 14, 2023. That filing will include an amended complaint.

After we advised the Court of this Defendants' Counsel wrote to the Court to note that a First Amended Complaint had already been filed. They were technically correct. When we filed our initial pleading there were problems with the filing and not all 86 Plaintiffs had been placed on the docket. The First Amended Complaint was simply a way to fully accomplish our initial filing.

Later today we will refile our Motion for a Preliminary Injunction and address all the issues the Court raised in our July hearing. Rather than having to also file a Motion to Amend we request that the Court grant leave to file the Second Amended Complaint, so that that Preliminary Injunction Motion can properly be addressed to it.

Respectfully submitted,

/s/ Arthur Z. Schwartz

Arthur Z. Schwartz

cc. All Counsel by ECF